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June 22, 2015

**BY ECF**

The Honorable John Gleeson  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States v. Hasbajrami,*  
11 Cr. 623 (JG)

Dear Judge Gleeson:

This letter is in regard to the above-entitled case, in which I, along with Steven Zissou, Esq., and Michael Bachrach, Esq., represent defendant Agon Hasbajrami, and relates to the defense's motion, pursuant to *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 526 U.S. 59 (1993), to preclude the testimony of the government's proposed expert, Evan Kohlmann.

It is respectfully requested that the due date for the motion be extended one day until tomorrow, June 23, 2015, because of logistical issues with respect to completing the two components of the motion – the publicly filed version and the supplement that must be prepared in the Secure Compartmentalized Information Facility – and the time needed for review of the motion by co-defense counsel.

I have spoken with Assistant United States Attorney Peter W. Baldwin, who has informed me that the government consents to this request, with the concurrent request that the government's response be moved back one day – to June 30, 2015 – as well. The requested scheduling adjustment will not affect the hearing date, which the Court has set for the morning of Mr. Kohlmann's testimony.

Respectfully Submitted,



Joshua L. Dratel

JLD/

cc: Seth D. DuCharme  
Peter W. Baldwin  
Assistant United States Attorneys